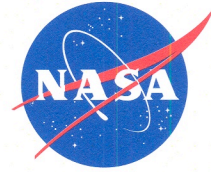


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



March 28, 2012

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the Goddard Symposium Conference and Luncheons hosted by the American Astronautical Society on March 28, 2012

On March 28, 2012, the American Astronautical Society, a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host the Goddard Symposium Conference and luncheon with the support of Boeing Company, SpaceX, and SGT at the Greenbelt Marriott in Greenbelt, Maryland from 8:30 a.m. to 5 p.m. This event is a two-day conference with a luncheon each day open to the public. The theme for the conference is "Dreams and Possibilities: Planning for the Achievable." The purpose of the event is to highlight the goals of NASA's strategic Plan.

Approximately 350-400 people are expected to attend. The estimated cost of the luncheon including all food and beverages is \$40.00 per person. However, the registration fee for U.S. government employees is \$350. Fees are waived for all speakers at this event. The event will be attended by representatives of the aerospace industry, professional society members, academia, representatives of other non-profit organizations, public officials, and other Federal agencies. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Accordingly, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the event. The non-career employees will need to reimburse the cost of what they consume.

However, NASA employees whose duties may substantially affect the sponsors such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 may only attend the reception if they reimburse the sponsors the cost of the refreshments consumed.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone